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BRIGHTHOUSE LIFE INSURANCE COMPANY,  
METROPOLITAN LIFE INSURANCE COMPANY,  
and METLIFE REAL ESTATE LENDING, LLC

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA - FRESNO DIVISION

METROPOLITAN LIFE INSURANCE  
COMPANY, a New York corporation,

Plaintiff,  
v.

ACDF, LLC, a California limited liability company, *et al.*,

## Defendants.

Lead Case No. 1:24-cv-01261-KES-SAB

Consolidated with Case Nos:  
1:24-cv-01226; 1:24-cv-01230;  
1:24-cv-01231; 1:24-cv-01232;  
1:24-cv-01233; 1:24-cv-01235; and  
1:24-cv-01241

## **JOINT STATUS REPORT**

Honorable Magistrate Stanley A. Boone

- Affects All Cases
  - Affects Metropolitan Life Ins. Co. v. ACDF, LLC, et al., 1:24-cv-01261
  - Affects Metropolitan Life Ins. Co. v. FNF Farms, LLC, et al., 1:24-cv-01226
  - Affects Metropolitan Life Ins. Co. v. C & A Farms, LLC, et al., 1:24-cv-01230
  - Affects Metropolitan Life Ins. Co. v. Maricopa Orchards, LLC, et al., 1:24-cv-01231
  - Affects Brighthouse Life Ins. Co. v. Kamm South, LLC, et al., 1:24-cv-01232
  - Affects Brighthouse Life Ins. Co. v. Manning Avenue Pistachios, LLC, et al., 1:24-cv-01233 Case No. 1:24-cv-01233
  - Affects Brighthouse Life Ins. Co. v. ACDF, LLC, et al., 1:24-cv-01235
  - Affects MetLife Real Estate Lending, LLC v. Panoche Pistachios, LLC, et al., 1:24-cv-01241

1 Plaintiffs Brighthouse Life Insurance Company, Metropolitan Life Insurance Company, and  
 2 MetLife Real Estate ending, LLC (collectively, “Plaintiffs”) filed eight Complaints<sup>1</sup> alleging  
 3 Defendants’ breach of loan agreements and guaranty agreements under the respective loan  
 4 documents, as defined in the pleadings.<sup>2</sup> The cases were administratively consolidated on  
 5 December 12, 2024 with Case No. 1:24-cv-01261-KES-SAB as the Lead Case. (ECF No. 54.)

6 Pursuant to the Court’s October 6, 2025 Orders<sup>3</sup>, the undersigned counsel for Plaintiffs and  
 7 Defendants<sup>4</sup> (collectively, the “Parties”) respectfully submit the following Joint Status Report and  
 8 request a 90-day continuance of the Initial Scheduling Conference.

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<sup>1</sup> *Metropolitan Life Ins. Co. v. FNF Farms, LLC, et al.*, 1:24-cv-01226; *Metropolitan Life Ins. Co. v. C & A Farms, LLC, et al.*, 1:24-cv-01230; *Metropolitan Life Ins. Co. v. Maricopa Orchards, LLC, et al.*, 1:24-cv-01231; *Brighthouse Life Ins. Co. v. Kamm South, LLC, et al.*, 1:24-cv-01232; *Brighthouse Life Ins. Co. v. Manning Avenue Pistachios, LLC, et al.*, 1:24-cv-01233; *Brighthouse Life Ins. Co. v. ACDF, LLC, et al.*, 1:24-cv-01235; *MetLife Real Estate Lending, LLC v. Panoche Pistachios, LLC, et al.*, 1:24-cv-01241; *Metropolitan Life Ins. Co. v. ACDF, LLC, et al.*, 1:24-cv-01261.

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<sup>2</sup> See Complaints, Loan Documents: 1:24-cv-01261 (ECF No. 1, Factual Background, section A); 1:24-cv-01226 (ECF No. 1, Factual Background, section A); 1:24-cv-01230 (ECF No. 1, Factual Background, section A); 1:24-cv-01231 (ECF No. 1, Factual Background, section A); 1:24-cv-01232 (ECF No. 1, Factual Background, section A); 1:24-cv-01233 (ECF No. 1, Factual Background, section A); 1:24-cv-01235 (ECF No. 1, Factual Background, section A); and 1:24-cv-01241 (ECF No. 1, Factual Background, section A).

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<sup>3</sup> See Orders: 1:24-cv-01261 (ECF No. 178); 1:24-cv-01226 (ECF No. 35); 1:24-cv-01230 (ECF No. 70); 1:24-cv-01231 (ECF No. 35); 1:24-cv-01232 (ECF No. 36); 1:24-cv-01233 (ECF No. 38); 1:24-cv-01235 (ECF No. 39); and 1:24-cv-01241 (ECF No. 35).

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<sup>4</sup> Defendants Maricopa Orchards, LLC; ACDF, LLC, as successor by merger to 104 Partners, LLC; Willow Avenue Investments, LLC; Ashlan & Hayes Investments, LLC; Grantor Fresno Clovis Investments, LLC; Maricopa Orchards, LLC; Manning Avenue Pistachios, LLC; C & A Farms, LLC; Cantua Orchards, LLC; FNF Farms, LLC; Panoche Pistachios, LLC; Kamm South, LLC; Donald E. Schramm and Nada L. Schramm Revocable Trust Dated 12/2/2010; The Thomsen Family Trust Dated 11/24/2010; Daniel L. Sweet, an individual; Carole A. Sweet, an individual; Donald E. Schramm, an individual; Nada L. Schramm, an individual; Keith A. Thomsen, an individual; the testate and intestate successors of Catherine S. Thomsen, deceased, and all persons claiming by, through or under such decedent; Farid Assemi, an individual; Farshid Assemi, an individual; and Darius Assemi, an individual (collectively, the “Defendants”). As of the time of this filing, counsel for Plaintiffs did not receive a response or signature authorization from counsel for Dumar, LLC and Pistache, LLC.

1       I.       STATUS OF SERVICE AND APPEARANCES

2           All Defendants have been served with the respective Complaints, and all Defendants have  
 3       answered. Plaintiff Metropolitan Life Insurance Company provides further clarification on the  
 4       status of certain Defendants in two of its cases discussed in the Court's Orders:

5           In its October 6, 2025 Order in Case No. 1261, the Court noted that two defendants, Ashlan  
 6       & Hayes Investments, LLC and Grantor Fresno Clovis Investments, LLC have not appeared (ECF  
 7       No. 178). Plaintiff Metropolitan Life Insurance Company respectfully notes that Ashlan & Hayes  
 8       Investments, LLC and Grantor Fresno Clovis Investments, LLC submitted an Answer on April 30,  
 9       2025 (ECF No. 140) and are currently represented by Wanger Jones Helsley PC (ECF No. 160).

10          In its October 6, 2025 Order in Case No. 1230, the Court observed that one defendant on  
 11       the docket, Darius Assemi (in his individual capacity) has not appeared (ECF No. 140). Plaintiff  
 12       Metropolitan Life Insurance Company respectfully notes that this is an error on the Parties' part.  
 13       On November 4, 2024, Plaintiff dismissed Darius Assemi as Trustee of the AMENDED AND  
 14       RESTATED DARIUS ASSEMI REVOCABLE TRUST, dated March 2, 2010. (ECF No. 33.)  
 15       Darius Assemi, in his individual capacity, remained a defendant. (*Id.*) Darius Assemi submitted  
 16       an Answer on May 9, 2025 (ECF No. 62), which was filed on behalf of Darius Assemi both as an  
 17       individual *and* Trustee, but should have been filed on behalf of Darius Assemi as an individual  
 18       only, not Trustee, since Darius Assemi in his capacity as Trustee was previously dismissed.

19       II.       REQUEST FOR CONTINUANCE

20          The Parties respectfully request a 90-day continuance (to January 26, 2026) of the Initial  
 21       Scheduling Conference. A sale of real property was approved by the Court on September 24, 2025  
 22       in Case No. 1231 (see ECF No. 173), and additional sales in other cases may be forthcoming. These  
 23       developments are expected to significantly narrow the scope of the discovery plan and the issues  
 24       to be addressed at the Initial Scheduling Conference. Given the complexity of these multi-party  
 25       proceedings, the Parties request additional time to meet and confer on a discovery plan, case  
 26       schedule, and the matters at issue in the various cases.

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1 DATED: October 10, 2025

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2 */s/ Michelle J. Rosales*

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9 BRIGHTHOUSE LIFE INSURANCE  
COMPANY, METROPOLITAN LIFE  
INSURANCE COMPANY, and METLIFE  
REAL ESTATE LENDING, LLC

10 DATED: October 10, 2025

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17 ACDF, LLC; C&A FARMS, LLC; CANTUA  
ORCHARDS, LLC; FNF FARMS, LLC;  
18 KAMM SOUTH, LLC; MARICOPA  
ORCHARDS, LLC; ASHLAN & HAYES  
INVESTMENTS, LLC; PANOCHE  
PISTACHIOS, LLC; WILLOW AVENUE  
INVESTMENTS, LLC; MANNING AVENUE  
PISTACHIOS, LLC; GRANTOR FRESNO  
CLOVIS INVESTMENTS, LLC

21 DATED: October 10, 2025

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26 *Attorneys for Defendants*

27 FARID ASSEMI, an individual, and FARSHID  
ASSEMI, an individual.

1 DATED: October 10, 2025

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3 /s/ Ali M. Mojhehi  
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7 DARIUS ASSEMI, an individual

8 DATED: October 10, 2025

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10 /s/ Dirk E. Schramm  
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13 *Attorneys for Defendants*  
14 DONALD E. SCHRAMM AND NADA L.  
15 SCHRAMM REVOCABLE TRUST DATED  
16 12/2/2010; THE THOMSEN FAMILY TRUST  
17 DATED 11/24/2010; DANIEL L. SWEET, AN  
18 INDIVIDUAL; CAROLE A. SWEET, AN  
19 INDIVIDUAL; DONALD E. SCHRAMM, AN  
20 INDIVIDUAL; NADA L. SCHRAMM, AN  
21 INDIVIDUAL; KEITH A. THOMSEN, AN  
22 INDIVIDUAL; THE TESTATE AND  
23 INTESTATE SUCCESSORS OF  
24 CATHERINE S. THOMSEN, DECEASED,  
25 AND ALL PERSONS CLAIMING BY,  
26 THROUGH OR UNDER SUCH DECEDENT

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28 **ATTESTATION UNDER L.R. 131(c)**

29 Pursuant to Civil Local Rule 131(c), I attest under the penalty of perjury that the above  
30 signatories authorized the use of an electronic signature and concurred in the filing of this  
31 document.

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33  
34 DATED: October 10, 2025

35 /s/ Michelle J. Rosales  
36 MICHELLE J. ROSALES